

## REPORTS ANALYSIS DIVISION REFERRAL

TO

## OFFICE OF GENERAL COUNSEL

DATE: May 20, 2015

ANALYST: David Butler

I. COMMITTEE: Republican Majority Campaign  
C00442319  
Randy Goodwin, Treasurer  
13421 Malena Dr.  
Santa Ana, CA 92705

II. RELEVANT STATUTE: 52 U.S.C. §30104(b)(2) and (4)  
11 CFR §104.3(a) and (b)

## III. BACKGROUND:

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Republican Majority Campaign ("the Committee") amended its 2014 April Quarterly Report to disclose additional receipts of \$658,359.09 and additional disbursements of \$670,461.08, which were not disclosed in the original report (Attachment 2).

On April 15, 2014, the Committee filed the original 2014 April Quarterly Report covering the period from January 1, 2014 through March 31, 2014. The report disclosed no receipts on Line 11(a)(i) (Itemized Contributions from Individuals), Line 11(a)(ii) (Unitemized Contributions from Individuals), and Line 17 (Other Federal Receipts) of the Detailed Summary Page. The report also disclosed no disbursements on Line 21(b) (Other Federal Operating Expenditures) and Line 23 (Contributions to Federal Candidates/Committees and Other Political Committees) of the Detailed Summary Page (Images 14960783258-9).

On July 15, 2014, the Committee filed an Amended 2014 April Quarterly Report. The report disclosed \$5,450.00 in receipts on Line 11(a)(i), \$651,382.68 on Line 11(a)(ii), and \$1,526.41 on Line 17 of the Detailed Summary Page, a total increase in receipts of \$658,359.09 from the original report. The report also disclosed \$667,461.08 in disbursements on Line 21(b)

and \$3,000.00 on Line 23 of the Detailed Summary Page, a total increase in disbursements of \$670,461.08 from the original report (Images 14941831814-5).

Also on July 15, 2014, the Committee filed a Miscellaneous Electronic Submission ("Form 99") which stated:

"In the process of preparing to file the 2nd quarter report I discovered that the 1st quarter report that was uploaded in April lacked complete information. This was the result of a problem with the FEC File software. I spent many hours entering data for the 1st quarter report and I encountered a major glitch which resulted in the data being lost.

I thought I had recovered the lost data when the FEC windows came back on my computer screen showing the data I had entered.

My situation is complicated by the fact that I use PC simulation software on a Macintosh in order to be able to use FEC File. The marriage of the PC software on the MAC is OK but not perfect. I do occasionally encounter unexplained problems. The mouse function, for example, works only sporadically.

In this case when it appeared that I had lost all the data I tried every avenue I could think of to recover the data. During my efforts I was able to recover window images from the FEC File program which appeared to show that the data I had entered was not lost. I then proceeded to file the report on April 15.

After discovering a few days ago that the file contained incomplete data I made an effort to understand what had happened. I consulted an expert who told me it could be one of two problems. First, that the windows I had recovered came from my computer's memory cache and were created before the data was lost. The second possibility is that I had inadvertently created a second file for RMC-PAC in the FEC File program and entered the data into that file and it wasn't integrated into the existing file.

Whatever the reason, I thought I had filed a complete report in April.

Since discovering this problem a few days ago, I prepared and filed an amendment which contains the missing data" (Image 14961626879).

On October 14, 2014, a Request for Additional Information (RAI) was sent to the Committee referencing the Amended 2014 April Quarterly Report, received July 15, 2014. Among other items, the RAI requested clarification regarding the substantial increase in receipts and disbursements disclosed on the Amended 2014 April Quarterly Report that were not disclosed on the original filing (Image 14330062396).

On November 18, 2014, Randy Goodwin, the Committee's Treasurer, called the Reports Analysis Division (RAD) Analyst to discuss the RFAI sent to the Committee regarding the Amended 2014 April Quarterly Report, received July 15, 2014. The Analyst stated that the increases in activity could be forwarded to another office for further Commission action. In addition, the Analyst advised Mr. Goodwin that the Committee could file an additional Form 99 if they wished to provide any further information to the public record regarding the increase in activity (Attachment 3).

On November 19, 2014, the Committee filed a Form 99, which stated in part:

"I completed the report on the evening of April 15 and ran it through the validation procedure and attempted to upload the report. I made several unsuccessful attempts at filing the report. As I was preparing to make another attempt to upload, something catastrophic occurred and the report vanished from my computer screen.

I panicked and began trying to figure out what had just happened. I opened and closed files, checked the computer desktop and looked everywhere I could think of for the missing report. After a few minutes of this, something I did caused what appeared to be a copy of the file to re-appear on my computer screen. Not wanting to take any chances of it disappearing again, I immediately uploaded the file to the FEC. I received my usual on-screen confirmation that it had been accepted and I heard my fax machine signal an incoming fax which always happens almost immediately after the report is filed.

I was greatly relieved that whatever had happened seemed to have resolved itself. At that point nothing I had seen indicated to me that the report I filed contained no data.

I had a report for another committee that was due that night so I immediately switched my attention away from RMC-PAC and moved on to work on the next report.

As I explained in in [sic] the Miscellaneous Text attached to my original amendment, my situation is unusual because I file the reports using a Macintosh computer, but the FEC File program is not written to run on a Macintosh computer. In order to use FEC File I have to use a program which simulates the PC environment which FEC File was written for" (Images 14952594154-5).

On December 8, 2014, the RAD Analyst left a message for Mr. Goodwin stating that the increase in financial activity disclosed on the Amended 2014 April Quarterly Report, received July 15, 2014 could be referred for further Commission action. The Analyst also informed Mr. Goodwin that if the Committee wished to place any further clarifying information regarding this issue on the public record, it should do so by December 12, 2014 (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

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O-Index (2015-2016)															
Cmte. ID: C00442319    Cmte. Name: REPUBLICAN MAJORITY CAMPAIGN															
Treasurer Name: RANDY GOODWIN    Address: 13421 MALENA DR, SANTA ANA, CA 92705															
Cmte. Type: Q (QUALIFIED NON-PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			4/24/2015	1	15970678127				-	-	\$0	-	-	-	-
Totals												\$0			

O-Index (2013-2014)															
Cmte. ID: C00442319    Cmte. Name: REPUBLICAN MAJORITY CAMPAIGN															
Treasurer Name: RANDY GOODWIN    Address: 13421 MALENA DR, SANTA ANA, CA 92705															
Cmte. Type: Q (QUALIFIED NON-PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			5/14/2013	1	13962215457				-	-	-	-	-	-	-
MS-T			5/14/2013	1	13962215458				-	-	-	-	-	-	-
MS-T			7/15/2014	1	14961626879				-	-	-	-	-	-	-
MS-T			11/19/2014	2	14952594154				-	-	-	-	-	-	-
RQ2	Q1	A	10/14/2014	2	14330062396	1/1/2014	3/31/2014	10/14/2014	-	-	-	-	-	-	-
RQ2	YE	A	3/19/2015	2	15330079014	11/25/2014	12/31/2014	3/19/2015	-	-	-	-	-	-	-
F3XN	Q1	N	4/16/2013	50	13961646929	1/1/2013	3/31/2013		\$97,323	\$450,575	\$491,552	\$56,345	\$6,964	-	\$6,964
F3XN	Q2	N	7/31/2013	37	13964490026	4/1/2013	6/30/2013		\$56,345	\$381,652	\$392,639	\$45,358	\$6,964	-	\$6,964
F3XN	YE	N	2/1/2014	68	14940325231	7/1/2013	12/31/2013		\$45,358	\$728,655	\$728,246	\$45,767	\$6,964	-	\$6,964
F3XN	Q1	N	4/15/2014	6	14960783256	1/1/2014	3/31/2014		\$45,767	\$0	\$0	\$45,767	\$6,964	-	\$6,964
F3XA	Q1	A	7/15/2014	42	14941831812	1/1/2014	3/31/2014		\$45,767	\$658,359	\$670,461	\$33,665	\$6,964	-	\$6,964
F3XN	Q2	N	7/15/2014	78	14941834194	4/1/2014	6/30/2014		\$33,665	\$774,537	\$773,404	\$34,798	\$6,964	-	\$6,964
F3XN	Q3	N	10/15/2014	68	14978216023	7/1/2014	9/30/2014		\$34,798	\$780,874	\$786,502	\$29,170	\$0	-	\$0
F3XN	30Q	N	12/4/2014	49	14953005569	10/1/2014	11/24/2014		\$29,170	\$274,082	\$297,988	\$5,264	-	-	\$0
F3XN	YE	N	1/31/2015	26	15970254484	11/25/2014	12/31/2014		\$5,264	\$82,709	\$107,691	\$19,717	-	-	\$0
F3XA	YE	A	1/31/2015	26	15950588942	11/25/2014	12/31/2014		\$5,264	\$82,709	\$107,691	\$19,717	-	-	\$0
F3XA	YE	A	4/24/2015	26	15951221785	11/25/2014	12/31/2014		\$5,264	\$92,709	\$92,553	\$5,420	-	-	\$0
Totals										\$4,141,445	\$4,233,348				

O-Index (2011-2012)															
Cmte. ID: C00442319    Cmte. Name: REPUBLICAN MAJORITY CAMPAIGN															
Treasurer Name: RANDY GOODWIN    Address: 13421 MALENA DR, SANTA ANA, CA 92705															
Cmte. Type: Q (QUALIFIED NON-PARTY)    Cmte. Designation: U (UNAUTHORIZED)    Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			1/27/2011	1	11930209355				-	-	-	-	-	-	-
RQ2	YE	N	4/9/2013	2	13330028476	10/1/2011	12/31/2011	4/9/2013	-	-	-	-	-	-	-
RQ2	Q2	N	4/9/2013	3	13330028478	4/1/2012	6/30/2012	4/9/2013	-	-	-	-	-	-	-
F3XN	Q1	N	4/16/2011	44	11930708679	1/1/2011	3/31/2011		\$38,581	\$803,336	\$756,634	\$85,284	\$4,714	-	\$4,714
F3XN	Q2	N	7/15/2011	47	11931925753	4/1/2011	6/30/2011		\$85,284	\$497,774	\$532,943	\$50,114	\$4,714	-	\$4,714
F3XN	Q3	N	10/16/2011	55	11971633066	7/1/2011	9/30/2011		\$50,114	\$416,338	\$436,793	\$29,659	\$6,964	-	\$6,964
F3XN	YE	N	1/31/2012	55	12970350078	10/1/2011	12/31/2011		\$29,659	\$521,834	\$487,293	\$64,200	\$6,964	-	\$6,964
F3XA	YE	A	5/14/2013	55	13962215402	10/1/2011	12/31/2011		\$29,659	\$521,834	\$487,293	\$64,200	\$6,964	-	\$6,964
F3XN	Q1	N	4/16/2012	44	12951455682	1/1/2012	3/31/2012		\$64,200	\$703,552	\$678,769	\$88,983	\$6,964	-	\$6,964

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F3XN	Q2	N	7/16/2012	50	12971467628	4/1/2012	6/30/2012	\$88,983	\$707,426	\$742,151	\$54,258	\$6,964	-	\$6,964
F3XN	Q3	N	10/16/2012	69	12954447591	7/1/2012	9/30/2012	\$54,258	\$1,113,360	\$957,409	\$210,208	\$6,964	-	\$6,964
F3XN	12G	N	10/26/2012	24	12961214272	10/1/2012	10/17/2012	\$210,208	\$340,622	\$317,403	\$233,428	\$6,964	-	\$6,964
F3XN	30G	N	12/7/2012	32	12963017450	10/18/2012	11/26/2012	\$233,428	\$480,567	\$611,875	\$102,120	\$6,964	-	\$6,964
F3XN	YE	N	2/1/2013	23	13960783116	11/27/2012	12/31/2012	\$102,120	\$191,238	\$196,035	\$97,323	\$6,964	-	\$6,964
F24N	48		5/19/2012	1	12951857389			-	-	-	-	-	-	-
F24N	48		6/17/2012	1	12952130344			-	-	-	-	-	-	-
F24N	48		6/7/2012	1	12951949102			-	-	-	-	-	-	-
F24N	48		7/27/2012	1	12952599516			-	-	-	-	-	-	-
F24N	48		8/6/2012	1	12971841031			-	-	-	-	-	-	-
F24N	24		10/12/2012	1	12954340086			-	-	-	-	-	-	-
F24N	48		10/1/2012	1	12954245874			-	-	-	-	-	-	-
F24N	48		7/3/2012	1	12952248401			-	-	-	-	-	-	-
F24N	48		8/23/2012	1	12952835569			-	-	-	-	-	-	-
F24N	48		9/4/2012	1	12952869085			-	-	-	-	-	-	-
F24N	48		9/16/2012	1	12952918938			-	-	-	-	-	-	-
F24N	24		10/23/2012	1	12960681821			-	-	-	-	-	-	-
Totals									\$5,776,050	\$5,717,309				

**REPUBLICAN MAJORITY CAMPAIGN (C00442319)**

2014 April Quarterly Report/Amended 2014 April Quarterly Report

Overview of Additional Receipts

Report Line	2014 April Quarterly Report (Image 14960783258)	Amended 2014 April Quarterly Report, received 7/15/14 (Image 14941831814)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$0.00	\$5,450.00	\$5,450.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$651,382.68	\$651,382.68
Line 17: Other Federal Receipts	\$0.00	\$1,526.41	\$1,526.41
<b>Total Variance:</b>			<b>\$658,359.09</b>

Overview of Additional Disbursements

Report Line	2014 April Quarterly Report (Image 14960783259)	Amended 2014 April Quarterly Report, received 7/15/14 (Image 14941831815)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$0.00	\$667,461.08	\$667,461.08
Line 23: Contributions to Federal Candidates/Committees and Other Political Committees	\$0.00	\$3,000.00	\$3,000.00
<b>Total Variance:</b>			<b>\$670,461.08</b>